

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

PALTALK HOLDINGS, INC.,

Plaintiff

vs.

CISCO SYSTEMS, INC.,

Defendant.

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No. 6:21-cv-00757

JURY TRIAL DEMANDED

**DECLARATION OF SARAH E. PIEPMEIER IN SUPPORT OF CISCO'S REPLY IN
SUPPORT OF MOTION TO STAY PENDING EX PARTE REEXAMINATION**

I, Sarah E. Piepmeier, hereby declare as follows:

1. I make this declaration of my own personal knowledge, and if compelled to testify, I could and would competently testify thereto. I am a partner at Perkins Coie LLP, and I am lead counsel for Defendant Cisco Systems Inc. ("Cisco"). I submit this declaration in support of Defendant Cisco's Reply in Support of Cisco's Motion to Stay Pending *Ex Parte* Reexamination Addressing All Asserted Claims.

2. Attached as **Exhibit 1** is a true and correct copy of Paltalk's September 13, 2022 email cancelling two timely scheduled depositions of Cisco's witnesses and requesting that Cisco agree to an extension of fact discovery ("Paltalk's Request for Extension").

3. Attached as **Exhibit 2** is a true and correct copy of Cisco's September 15, 2022 email agreeing to Paltalk's Request for Extension with a reasonable modified schedule that does not improperly condense pretrial deadlines.

4. Attached as **Exhibit 3** is a true and correct copy of Paltalk's September 28, 2022 email attempting to condition the otherwise-agreed schedule on additional discovery terms (including new depositions).

5. Attached as **Exhibit 4** is a true and correct copy of Paltalk's September 28, 2022 email backing out of the otherwise-agreed schedule when Cisco did not agree to those additional discovery requests.

6. Attached as **Exhibit 5** is a true and correct copy of Paltalk's September 30, 2022 email requesting that Cisco make additional fact witnesses available past the September 22, 2022 fact discovery cut off.

7. I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my current knowledge.

Executed this 30th day of September, 2022 in San Francisco, California.

/s/ Sarah E. Piepmeier
Sarah E. Piepmeier